

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
MARSHALL DIVISION**

TQ DELTA, LLC,	§	
Plaintiff,	§	
	§	JURY TRIAL DEMANDED
v.	§	
	§	
COMMSCOPE HOLDING COMPANY,	§	
INC., COMMSCOPE INC., ARRIS	§	
INTERNATIONAL LIMITED, ARRIS	§	
GLOBAL LTD., ARRIS US HOLDINGS,	§	Civil Action 2:21-cv-310-JRG
INC., ARRIS SOLUTIONS, INC., ARRIS	§	(Lead Case)
TECHNOLOGY, INC., and ARRIS	§	
ENTERPRISES, LLC,	§	
	§	
NOKIA CORP., NOKIA SOLUTIONS	§	
AND NETWORKS OY, and NOKIA OF	§	Civil Action No. 2:21-cv-309-JRG
AMERICA CORP.	§	(Member Case)
	§	
Defendants.	§	

**JOINT MOTION TO STAY ALL DEADLINES AND NOTICE OF SETTLEMENT
BETWEEN TQ DELTA, LLC AND THE NOKIA DEFENDANTS**

Plaintiff TQ Delta, LLC (“TQ Delta”) and Defendants Nokia of America Corporation, Nokia Corporation, and Nokia Solutions and Networks Oy’s (“Nokia Defendants”) (collectively, “the parties”) hereby notify the Court that all matters in controversy between the parties have been settled, in principle. Accordingly, Plaintiff TQ Delta, LLC and the Nokia Defendants jointly move the Court to stay all deadlines related to claims between TQ Delta, LLC and the Nokia Defendants in the above-captioned case for 30 days, through December 23, 2022, so that appropriate dismissal papers may be submitted.

Dated: November 23, 2022

Respectfully submitted,

/s/ William E. Davis, III
William E. Davis, III

Texas State Bar No. 24047416
bdavis@davisfirm.com

Christian J. Hurt
Texas State Bar No. 24059987
churt@davisfirm.com

Rudolph “Rudy” Fink IV
Texas State Bar No. 24082997
rfink@davisfirm.com

Edward Chin
Texas State Bar No. 50511688
echin@davisfirm.com

Ty Wilson
Texas State Bar No. 24106583
twilson@davisfirm.com

THE DAVIS FIRM PC
213 N. Fredonia Street, Suite 230
Longview, Texas 75601
Telephone: (903) 230-9090
Facsimile: (903) 230-9661

Peter J. McAndrews (admitted *pro hac vice*)
pmcandrews@mcandrews-ip.com

Rajendra A. Chiplunkar (admitted *pro hac vice*)
rchiplunkar@mcandrews-ip.com

Ashley Ratycz (admitted *pro hac vice*)
aratycz@mcandrews-ip.com

**MCANDREWS, HELD & MALLOY
LTD.**
500 West Madison Street, 34th Floor
Chicago, IL 60661
Telephone: (312) 775- 8269
Facsimile: (312) 775-8100

**ATTORNEYS FOR PLAINTIFF
TQ DELTA, LLC**

/s/ M. Scott Stevens (with permission)

M. Scott Stevens (NC Bar # 37828)
Kirk T. Bradley (NC Bar # 26490)
Karlee Wroblewski (NC Bar # 55043)
Nic Marais (NC Bar # 53533)
ALSTON & BIRD LLP
One South at the Plaza
101 South Tryon Street, Suite 4000
Charlotte, North Carolina 28280
Tel: 704.444.1000
Fax: 704.444.1111
Email: scott.stevens@alston.com
Email: kirk.bradley@alston.com
Email: karlee.wroblewski@alston.com
Email: nic.marais@alston.com

John D. Haynes (GA Bar # 340599)
Michael Deane (GA Bar # 498195)
Katherine M. Donald (GA Bar # 753449)
ALSTON & BIRD LLP
One Atlantic Center
1201 West Peachtree Street
Suite 4900
Atlanta, GA 30309
Tel: 404.881.7737
Fax: 404.881.7777
Email: john.haynes@alston.com
Email: michael.deane@alston.com
Email: katie.donald@alston.com

Darlana Subashi (NY Bar # 5780747)
ALSTON & BIRD LLP
90 Park Avenue
New York, NY 10016
Tel: 212-210-9400
Fax: 212-210-9444
Email: darlena.subashi@alston.com

Adam Ahnhut (TX Bar # 24106983)
ALSTON & BIRD LLP
Chase Tower
2200 Ross Avenue, Suite 2300
Dallas, TX 75201
Email: adam.ahnhut@alston.com
Tel: 214.922.3400
Fax: 214.922.3899

*Counsel for Defendants
Nokia Corporation, Nokia Solutions
and Networks Oy, and Nokia
of America Corporation*

CERTIFICATE OF SERVICE

I hereby certify that all counsel of record who are deemed to have consented to electronic service are being served this November 23, 2022, with a copy of this document via CM/ECF.

/s/ William E. Davis, III
William E. Davis, III

CERTIFICATE OF CONFERENCE

The undersigned certifies that counsel have complied with the meet-and-confer requirements of Local Rule CV-7(h) and (i) and that the foregoing motion is joined in its entirety by Plaintiff TQ Delta, LLC and the Nokia Defendants.

/s/ William E. Davis, III
William E. Davis, III